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BY: ECF

Honorable James L. Cott
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Kaye v. NYC Health & Hospitals Corp. et al.*, 18-cv-12137 (JPC)(JLC)

Dear Judge Magistrate Judge Cott:

I write to respectfully request an additional one hour and thirty minutes to complete the deposition of plaintiff in the above-referenced action.

Yesterday plaintiff, Dr. Melissa Kaye, sat for deposition for approximately seven hours and twenty-four minutes before the deposition was ended by the court reporter due to computer issues. Prior to going off the record, I requested additional time from plaintiff's counsel to complete plaintiff's deposition. Plaintiff's counsel refused to consent to the additional time.

Due to the numerous allegations contained in plaintiff's complaint, coupled with plaintiff's lengthy and unclear responses that at times veered off-topic, defendants require the additional time to complete questioning regarding (1) the complaints that form the basis of plaintiff's First Amendment and New York Labor Law §740 claims, and (2) the damages plaintiff is claiming in this action.

For the reasons set forth above, defendants respectfully request an additional one hour and thirty minutes to complete the deposition of plaintiff.

Respectfully submitted,

ECF /s/

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cc: Special Hagan (by ECF)